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Attorneys for Defendant

**GOOGLE LLC**

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

JOHN DOE I, et al., individually and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:23-cv-02431-VC  
(Consol. w/ 3:23-cv-02343-VC)

**DECLARATION OF MIJU HAN IN  
SUPPORT OF GOOGLE LLC'S  
UNOPPOSED ADMINISTRATIVE  
MOTION TO SEAL JOINT LETTER  
BRIEF AND HAN DECLARATION RE:  
PRESERVATION**

First Amended Complaint Filed:  
November 16, 2023

*District Judge Vince Chhabria  
San Francisco Courthouse, Ctrm. 4*

I, Miju Han, declare as follows:

1. I am a Director of Product Management on the Privacy and Regulations Infrastructure team within Ads at Google LLC. I have worked at the intersection of privacy and Google's ads serving infrastructure since joining Google in 2022. As part of my duties, I am familiar with Google's internal policies that protect user data, and how Google's ad serving infrastructure is designed to comply with these policies. I am also familiar with Google's use of identifiers for advertising purposes and its policies prohibiting joining of data associated with authenticated, signed-in identifiers and pseudonymous identifiers. I make this declaration based on personal knowledge and knowledge acquired from my co-workers, and if called to testify, I could and would competently testify to such facts. I make this declaration in support of Google LLC's Unopposed Administrative Motion to Seal Joint Letter Brief Regarding Preservation and Declaration of Miju Han in support of the Joint Letter Brief (together, "Joint Letter Brief").

The internal mechanisms described in the Joint Letter Brief, particularly those related to the management and protection of user identifiers, are highly confidential. These processes, including the specific names and functionalities of the tables, projects, and keystores are crucial to Google's efforts to prevent unauthorized access by external threats or internal policy violations. Knowledge of these systems is strictly limited to essential personnel, and Google does not share this information publicly. Public disclosure of the processes and internal names mentioned could increase the risk of outside hackers attempting to infiltrate Google's data systems, as well as internal attempts to improperly access user data in violation of Google's stringent internal policies.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 8, 2024 in Oakland, California.



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Miju Han